

1 JEFFREY G. SLOANE, ESQ.  
 2 Nevada Bar No. 000784  
 3 8935 S. Pecos Road, Suite 21-A  
 Henderson, Nevada 89074  
 (702) 269-8570  
 jeff@jsloanelaw.com  
 4 Attorneys for Creditor/Movant  
 COPE FAMILY VENTURE

5 **UNITED STATES BANKRUPTCY COURT**

6 **DISTRICT OF NEVADA**

In re:	) Case No. BK-S-13-17588-LED (Lead Case)
WESTERN FUNDING INCORPORATED,	) Chapter 11
Debtor.	) (Jointly Administered)
	)
In re:	) Case No. BK-S-13-17586-LED
WESTERN FUNDING INC. OF NEVADA,	) Chapter 11
Debtor.	)
	)
In re:	) Case No. BK-S-13-17589-LED
GLOBAL TRACK GPS, LLC,	) Chapter 11
Debtor.	) Date of Hearing: November 23, 2013
	) Time of Hearing: 3:00 p.m.
	)
	) Judge: Hon Laurel E. Davis

19 **JOINDER TO OPPOSITION TO MOTION FOR ENTRY OF AN ORDER PURSUANT**  
**TO SECTIONS 105(A), 363, 365, 503 AND 507 OF THE BANKRUPTCY CODE AND**  
**RULES 2002, 6004, 6006, 9007, 9008 AND 9014 OF THE FEDERAL RULES OF**  
**BANKRUPTCY PROCEDURE APPROVING AND AUTHORIZING (A) BIDDING**  
**PROCEDURES IN CONNECTION WITH THE SALE OF SUBSTANTIALLY ALL OF**  
**THE OPERATING ASSETS OF DEBTORS; (B) FORM AND MANNER OF NOTICE OF**  
**THE SALE HEARING; AND (C) RELATED RELIEF AND JOINDER AND LIMITED**  
**OPPOSITION OF CLASS B MEMBERS OF HARBOR STRUCTURED FINANCE, LLC**  
**TO OPPOSITION TO DEBTORS' BIDDING PROCEDURE MOTION [DKT.320]**

24 Cope Family Venture ("Cope") by and through its counsel, Jeffrey G. Sloane, Esq., hereby  
 25 files this within joinder (the "Joinder") to the Official Committee of the Unsecured Creditors'  
 26 Opposition to Motion for Entry of an Order Pursuant to Sections 105(a), 363, 365, 503 and 507 of  
 27 the Bankruptcy Code and Rules 2002, 6004, 6006, 9007, 9008 and 9014 of the Federal Rules of  
 28

1 Bankruptcy Procedure Approving and Authorizing (A) Bidding Procedures in Connection With the  
2 Sale of Substantially All of the Operating Assets of Debtors; (B) Form and Manner of Notice of the  
3 Sale Hearing; and (C) Related Relief ("Official Committee of Unsecured Creditors Opposition") [Dkt.  
4 No. 356] and the Joinder and Limited Opposition of Class B Members of Harbor Structured  
5 Finance, LLC to Opposition to Debtors' Bidding Procedure Motion [Dkt. 320] ("Class B Members'  
6 Opposition") [Dkt. No. 357].

7 Cope incorporates by reference all of the arguments set forth in the Official Committee of  
8 Unsecured Creditors Opposition and the Harbor Class B Members' Opposition.

9 Cope believes that an extension to the bidding process is essential to maximize the potential  
10 for unsecured creditors to receive a benefit from the sale of assets. Furthermore, to deny an  
11 extension essentially denies the unsecured creditors due process to the extent that they have been  
12 given a very short and unreasonable time to determine whether their best interests are being  
13 properly accounted for.

14 Dated this 22<sup>nd</sup> day of November, 2013.

15 BY: /s/ JEFFREY G. SLOANE, ESQ.

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16 JEFFREY G. SLOANE, ESQ  
17 Nevada Bar No. 000784  
18 8935 S. Pecos Road, Suite 21-A  
Henderson, Nevada 89074  
Attorneys for Creditor

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Jeffrey G. Sloane, Esq., and that on the 22<sup>nd</sup> day of November, I caused to be served a true and correct copy of JOINDER TO OPPOSITION TO MOTION FOR ENTRY OF AN ORDER PURSUANT TO SECTIONS 105(A), 363, 365, 503 AND 507 OF THE BANKRUPTCY CODE AND RULES 2002, 6004, 6006, 9007, 9008 AND 9014 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE APPROVING AND AUTHORIZING (A) BIDDING PROCEDURES IN CONNECTION WITH THE SALE OF SUBSTANTIALLY ALL OF THE OPERATING ASSETS OF DEBTORS; (B) FORM AND MANNER OF NOTICE OF THE SALE HEARING; AND (C) RELATED RELIEF AND JOINDER AND LIMITED OPPOSITION OF CLASS B MEMBERS OF HARBOR STRUCTURED FINANCE, LLC TO OPPOSITION TO DEBTORS' BIDDING PROCEDURE MOTION [DKT.320] in the following manner:

12        X (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the  
13      United States Bankruptcy Court for the District of Nevada, the above-referenced document was  
14      electronically filed on the date hereof and served through the Notice of Electronic Filing  
15      automatically generated by that Court's facilities.

16       — (UNITED STATES MAIL) By depositing a copy of the above-referenced document  
17 for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the  
18 parties listed on the attached service list, at their last known mailing addresses, on the date above  
19 written.

20        \_\_\_\_ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-  
21 referenced document for overnight delivery via Federal Express, at a collection facility maintained  
22 for such purpose, addressed to the parties on the attached service list, at their last known delivery  
23 address, on the date above written.

24              (FACSIMILE) That I served a true and correct copy of the above-referenced document  
25 via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list,  
26 on the date above written.

/s/ Barbara Meyer  
An Employee of Jeffrey G. Sloan, Esq.